

FILED

March 07, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: Joseph Hinojos
DEPUTY

UNITED STATES DISTRICT COURT
 for the
 Western District of Texas

United States of America)	
v.)	
1.Willie Ben LARA)	Case No. PE: 24-MJ-94
2.Emily Rachael MEDLEY)	
3.Michael Angelo ESPINOSA)	
)	

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 5, 2024 in the county of Hudspeth in the
Western District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. 841	Possession With Intent to Distribute - Methamphetamine and Fentanyl
21 U.S.C. 846	Conspiracy to Possess with Intent to Distribute Methamphetamine and Fentanyl
(1-3)	

This criminal complaint is based on these facts:

See Affidavit

Continued on the attached sheet.

Complaint sworn to telephonically and signed electronically on this date.

FED.R.CRIM.P. 4.1(b)(2)(A)

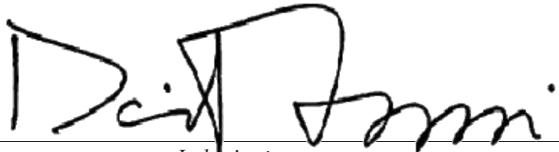
**SAMUEL P
PRINGLE**

Digitally signed by SAMUEL P PRINGLE
Date: 2024.03.06 19:27:05
-06'00'

Complainant's signature

Samuel Pringle - Special Agent, HSI

Printed name and title



Judge's signature

David Fannin, U.S. Magistrate Judge

Printed name and title

Date: 03/07/2024

City and state: Pecos, Texas

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
Pecos Division

I, Samuel Pringle, being duly sworn, depose and state as follows:

PROBABLE CAUSE

On March 5, 2024, Texas Department of Public Safety (DPS) Criminal Investigations Division (CID) Special Agent (SA) John Handowski and Homeland Security Investigations (HSI) Special Agent Samuel Pringle had personal knowledge and was advised by Hudspeth County Sheriff's Office Lieutenant Deputy Elvis Wolf of the following facts:

Lieutenant Deputy Wolf conducted a traffic stop on a silver Ford Escape bearing a Texas license plate for a violation of Texas Transportation Code 545.417: Obstructed View Through Windshield, namely large and expansive cracks as well as spray paint from a crude "eyebrow" painted on the inside of the vehicle's windshield.

The vehicle traffic stop occurred in Sierra Blanca, Texas which is within the Western District of Texas. The driver was identified as Willie Ben LARA III. The front passenger was identified as Emily MEDLEY. The right rear passenger was identified as Michael ESPINOSA.

A United States Border Patrol (USBP) canine conducted a non-intrusive exterior sniff of the vehicle. The canine alerted to the presence of a narcotic odor emitting from the interior of the vehicle. Probable cause to search the vehicle, and the vehicle's occupants was obtained through this canine alert. A USBP agent conducted a search of MEDLEY's person and located four glass pipes containing methamphetamine residue. MEDLEY stated that she was given the pipes by ESPINOSA to conceal for him in case they got stopped. All subjects were transported to the Hudspeth County Sheriff's Office for further investigation.

MEDLEY was placed under arrest for Possession of Drug Paraphernalia. MEDLEY was then advised of her Miranda warnings. MEDLEY admitted she had methamphetamine and fentanyl concealed in her body and stated ESPINOSA had given them to her to hide them. MEDLEY then produced approximately 13.8 grams of crystal methamphetamine, 10.9 grams of fentanyl pills, 2.6 grams of fentanyl powder, and 3.5 grams of fentanyl in "rock" form known as "cement." CID SA Handowski and HSI SA Pringle responded and conducted custodial interviews.

During the audio/video recorded custodial interviews, all subjects were advised of their Miranda warnings and waived their rights. During the interviews, SA Pringle and SA Handowski learned that LARA, MEDLEY, and ESPINOSA traveled from Alpine, TX to El Paso, Texas on the night of March 2 and into the morning of March 3, 2024. They then drove to a residence in Chaparral, New Mexico where a quantity of methamphetamine and fentanyl was purchased. LARA, MEDLEY, and ESPINOSA then used these narcotics over the duration of the next day. They then returned to the residence in Chaparral, New Mexico and purchased additional narcotics for personal use and resale. LARA, MEDLEY, and ESPINOSA each admitted that the methamphetamine was to be split between them. LARA stated that 30 of the fentanyl pills were for his and MEDLEY's personal use and that the rest were to be split up and given to ESPINOSA for resale. Both MEDLEY and LARA stated that the narcotics purchased were to be split between ESPINOSA and LARA at ESPINOSA's residence in Alpine and that ESPINOSA

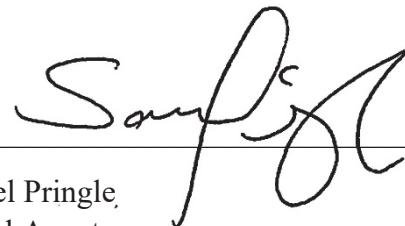
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would then sell the narcotics on LARA's behalf. ESPINOSA admitted that, historically, he would obtain narcotics from LARA and would sell on LARA's behalf. ESPINOSA would then transfer monies to LARA for the purchase of more narcotics.

CONCLUSION

Based on the facts and circumstances stated above, I submit that there is probable cause to believe that Willie LARA, Emily MEDLEY, and Michael ESPINOSA committed violations of Title 21, United States Code, Section 841(a)(1), *Possession with Intent to Distribute Methamphetamine and Fentanyl* and Title 21, United States Code, Section 846, *Conspiracy to Possess with Intent to Distribute Methamphetamine and Fentanyl*.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



Samuel Pringle,
Special Agent
Homeland Security Investigations



The Honorable David B. Fannin
United States Magistrate Judge
Western District of Texas (Pecos Division)